UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

August 17, 2007

Reply To
Attn Of: ECL-112

Mr. Stuart Dearden
SLLI c/o Sanofi-Aventis
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Mr. Robert L. Ferguson
Director of Remediation
Starlink Logistics, Inc.
One Copley Parkway
Suite 309
Morrisville, NC 27560

Subject: Source Control at the Rhone Poulenc Site (ESCI #155)

Dear Mssrs. Dearden and Ferguson:

EPA is writing to you to follow up on a conversation between Sean Gormely/AMEC and Sean Sheldrake of our office to articulate Rhone Poulenc source control needs, and timing. In order to not encumber Arkema or GASCO/Siltronic source control or early action efforts and to ensure that the long-term cleanup of Portland Harbor is not delayed, immediate action is required to control groundwater contamination migrating from the Rhone Poulenc facility. Specifically:

1. In-water and upland data clearly establishes Rhone Poulenc contaminants as a current source to the Willamette River. Contaminants detected in groundwater at the Rhone Poulenc facility have been detected in Willamette River sediments and transition zone water at contcntrations that may pose a risk to human health and the environment and have the potential to recontaminate actual or potential early action areas, as well as future remedial action areas.
2. Current source control efforts may be inadequate, both in geographic scope, and with respect to targeted contaminants and preliminary removal/remediation goals (which should be comprised of JSCS values, including the 17.5 gram fish consumption standards) to ensure protection of human health and the environment.
3. EPA views control of contaminant sources from the Rhone Poulenc site necessary to reduce risk to receptors and prevent recontamination of any in-water or down-gradient upland remedy.

4. A comprehensive source control evaluation that considers overlap of plumes and contaminant flux to the river is necessary to ensure the completeness and effectiveness of source control actions taken at the Rhone Poulenc site.
5. The evaluation of source control measures should consider a two tier complete hydraulic control system - one hydraulic control system near the river, one closer to the site – to ensure that groundwater contaminants associated with the Rhone Poulenc facility are not unnecessarily impacting or complicating source control actions that are or will be required at the GASCO/Siltronic and Arkema sites. If alternative measures are to be considered, they must be proven technologies that are shown to work at full-scale level as part of a comprehensive source control evaluation.
6. EPA will be evaluating sediments near the railroad bridge relative to their early action status. Current information indicates that Rhone Poulenc likely has contributed to this hot spot. You should begin to work cooperatively with Arkema to address this hot spot.
7. EPA would appreciate having documents sent directly to us concurrently with ODEQ. One copy to Kristine Koch (pdf at a minimum, or pdf and hardcopy) would be adequate to share the information internally. Additionally, EPA would like a list of all contaminants at the site, a list of all reports prepared for this site prior to the date of this letter, all monitoring data in electronic format (e.g., Excel spreadsheet), and a list of all wells and borings (including name/ID, depth, screen intervals, elevations, etc.). EPA currently has limited information on the Rhone Poulenc site and your plans for source control and other cleanup activity.

EPA would suggest that the earlier conventional, aggressive technologies are applied at this site, the less likely the Rhone Poulenc site discharges may impact EPA's ability to go forward with an in-water cleanup action. Please contact us at (206) 553-6705 or (206) 553-1220, respectively, with any questions or concerns.

Sincerely,

Kristine Koch, Project Manager
Sean Sheldrake, Project Manager